



Mr. Bill Pennington
California Energy Commission
1516 Ninth Street, MS-28
Sacramento, Calif.
95814

11/14/01

Re: Duct R-Values

Dear Mr. Pennington,

We are writing this letter in support of considerations underway at the California Energy Commission to increase the minimum R-Values in new residential and commercial air distribution systems. The CEC has done an outstanding job over the last several years in reducing duct leakage and the next logical phase of the CEC's emphasis should be increasing the minimum thermal R-Values of ducts.

California currently lags most states, counties and other code jurisdictions in mandating the use of higher air distribution R-Values. As a leading producer of flexible air duct, we are an excellent indicator of thermal value usage within the state. The minimum R4.2 thermal ducting continues to be the product of choice in 94% of our California shipments. Our trade association (ADC) reports that R6 and R8 now account for almost 40% of all ducting installed in the USA and trends show this percentage is growing annually. Current California energy codes have unfortunately done little to encourage duct thermal values exceeding the minimum R4.2.

With R6 and R8 volume continuing to increase in most areas of the country the price of these products has also dropped significantly in relationship to the minimum R4.2 thermal value. A vast majority of flexible air duct manufacturers offer both R6 and R8 and these products are readily available from a multitude of producers, wholesalers and contractors throughout the state.

We strongly believe that with the possible exception of several climatic zones along the Pacific Ocean every other climate zone within the state of California would benefit by mandating R5 or R8 thermal values. We would recommend that the state consider the same minimum for both commercial and residential construction, which would allow the distribution channels to carry only the approved product (not a multitude). As one of the founding members of the Air Diffusion Council (national trade association of flex duct producers) we would also suggest that when the CEC adopts higher thermal values you specify the method in which the thermal value is to be calculated (determined). The largest flex duct manufacturers calculate their respective thermal values using installed duct wall thickness and exclude air film resistance. Many members (including our company) of the ADC certify their thermal performance through third party inspection (UL).

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Our company is committed to increasing the use of higher R-Values and to that end has published our own brochure discussing in detail the reasons R6 or R8 make great “Cents”. You may want to review some of the thoughts we’ve assembled on these energy saving products.

Please feel free in contacting our company if we can be of additional assistance or source of information.

Sincerely,

John Lamborn

Enclosures (2)